

STATEMENT OF BASIS
Timberlands Landfill
Escambia, County
Facility No. 502-0080

Introduction

On May 5, 2015, Escambia County Environmental Corporation submitted a Title V Major Source Permit renewal application for their municipal solid waste landfill with a gas collection system and flare (SIC #4953). Timberlands Landfill currently has a Major Source Operating Permit for a Municipal Solid Waste Landfill with a design capacity of greater than 2.5×10^6 Megagrams with a gas collection and control system (GCCS) and flare. The Timberlands Landfill is located at 22800 Highway 41 in Brewton, Alabama.

Potential emissions are as follows:

Pollutant	Potential Emissions (tpy)
PM ₁₀	46.85
SO ₂	7.55
NO _x	35.74
CO	194.47
NMOC (Uncontrolled)	26.25*
NMOC (Controlled)	2.63
VOC	10.24
HAPs	5.43

*The NMOC generation rate crossed the 50 Mg/yr NSPS threshold in 2003. Due to varying factors in landfill gas generation the current potential levels have temporarily dropped below 50 Mg/yr.

No other criteria pollutants are emitted in sufficient quantities, actually or potentially, to exceed the major source threshold of 100 tons per year.

Requirement

The facility is subject to Standards of Performance for New Stationary Sources (NSPS) 40 CFR 60 Subpart WWW-Standards of Performance for Municipal Solid Waste Landfills because it has a design capacity greater than 2.5×10^6 Megagrams. In 2003 Timberlands uncontrolled NMOC emissions exceeded the 50 Megagrams per year threshold and the facility has thus installed a gas collection and control system and is subject to the operational standards, and monitoring, recordkeeping, and reporting requirements for a GCCS.

Timberlands is also subject to Subpart AAAA, National Emission Standards for Hazardous Air Pollutants (NESHAP): Municipal Solid Waste Landfills. Subpart AAAA requires that Municipal Solid Waste Landfills comply with the requirements of 40 CFR Part 60, subpart WWW with the exception that the annual report required by 60.757(f) be submitted on a semi-annual basis rather than an annual basis. Subpart AAAA also requires MSW Landfills to keep the records and reports specified in the general provisions of 40 CFR part 60.

In addition to the requirements of the NSPS and NESHAP, the flare is also subject to the requirements of 40 CFR 60.18 covering general control device and work practice requirements.

The potential criteria pollutant emissions from the landfill are less than 250 tons per year; therefore the facility is not subject to PSD.

Monitoring of emissions

Timberlands Landfill maintains records on site of design capacity, waste in place, and year to year waste acceptance rates and other records to show compliance to the New Source Performance Standard 40 CFR 60 Subpart WWW Standards of Performance for Municipal Solid Waste Landfills.

The flare is monitored to insure the continuous presence of a flame. Also the gas flow rate to the flare is monitored. The flare is operated in accordance with the requirements of 40 CFR 60.18.

CAM is not applicable as Timberlands is subject to NSPS and MACT standards which were both promulgated after November 15, 1990. According to 40 CFR 64.2(b)(1)(i), on exemptions from Compliance Assurance Monitoring, emission limitations or standards proposed after November 15, 1990 pursuant to section 111 or 112 of the Clean Air Act are exempt from CAM requirements, and there are no other source specific standards applicable to this facility.

Recommendation

I recommend that the Timberlands Landfill be issued the enclosed Title V permit 502-0080 with unit (X001) for a Municipal Solid Waste Landfill with a design capacity of greater than 2.5×10^6 Megagrams with a gas collection system and flare.

John Robert Gill
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Air Division

August 27, 2015